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October 25, 2023

Honorable Judge Robert Kirsch
United States District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Courtroom 4E
Trenton, NJ 08608

Re: Adler v. Gruma Corporation, 3:22-cv-06598

Dear Judge Kirsch,

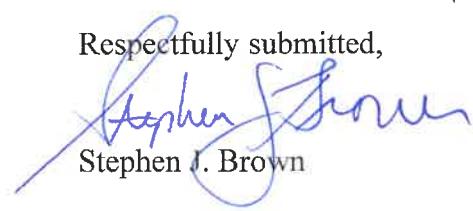
I am writing on behalf of the plaintiffs, Charles Adler, Grant Adler, and CM Adler, LLC (herein “Plaintiffs”), in the above-mentioned case. I write to respectfully request an update on this case and defendant Gruma Corporation’s (“Defendant”) pending motion seeking to compel arbitration and dismiss the action which was fully submitted on March 27, 2023.

Plaintiffs, of course, have opposed the Defendant's motion to compel arbitration and believe the action is properly before and should remain with this Court, as set forth in Plaintiffs' the opposition papers. In the intervening time, however, it needs to be stressed that Plaintiffs continue to endure significant hardships as a result of the Defendant's wrongful termination of their employment and the taking of their route without just compensation.

The Defendant's motion to compel arbitration has effectively delayed the hearing of the merits in this action. In light of the circumstances and the fact that the last docket entry was on May 15, 2023, indicating a reassignment of the case to your Honorable Court, we kindly and respectfully request that the Court expedite its review of the pending motion to dismiss and compel arbitration so that the matter can move forward with discovery and to a speedy trial of the facts.

We appreciate the Court's attention to this matter and are prepared to provide any additional information or participate in any necessary proceedings to support the court in reaching a decision. Your prompt consideration of this request is greatly appreciated. Thank you for your time and attention to this important matter.

Respectfully submitted,


Stephen J. Brown

SJB:ta

cc: (Via ECF)
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